

Enclosure B

COUNTY RESPONSE COVER PAGE – MUST BE FULLY COMPLETED AND SUBMITTED WITH PLAN AND DATA

TRINITY County is requesting participation in the Enhanced Anti-Fraud Program and will submit a Plan and Data as described above, by November 1, 2009.

Board of Supervisor Approval

Approved on Nov. 3, 2009, by the County Board of Supervisors

Name of Approver: Wendy Reiss, Chairman

Signature: Wendy Reiss

Name of County District Attorney Representative: _____

County District Attorney Representative Telephone #: _____

Email Address: _____

Name of County Welfare Department Representative: CAIGNEY HOFFMAN

County Welfare Department Representative Telephone #: 530-623-8267

Email Address: choffmann@trinitycounty.org

Trinity County Plan
IHSS Fraud Investigations and Program Integrity
2009/2010

I. IHSS Overpayments/Underpayments

Trinity County staff performing Quality Assurance (QA) activities will refer cases where IHSS fraud is suspected to the Fraud Investigator funded under this plan. This investigator will perform an in-depth investigation, including but not limited to a home visit.

If a potential overpayment or underpayment is identified, the investigator will compute the over/underpayment using CMIPS Payroll records.

When fraud is discovered, cases will be sent to the District Attorney for prosecution as appropriate.

Having an investigator act on suspected fraud cases in a timely manner will help reduce the occurrence of overpayments/underpayments, by identifying potential fraud cases quickly.

II. Fraud Referrals/Outcomes

If QA staff suspect IHSS fraud, a referral will be made to the Fraud Investigator. If QA staff or the Fraud Investigator suspect Medi-Cal fraud, those cases will be referred to the Medi-Cal Fraud Investigator.

III. Collaboration and Partnerships with District Attorney's Office (DAO)

Trinity County Health and Human Services has worked collaboratively with the District Attorney's Office for many years. We expect this collaboration to continue under this plan, including referring cases for prosecution where fraud is found during an investigation.

IV. Collaboration and Partnerships with California Department of Health Care Services and the California Department of Social Services

Trinity County already has a referral form and tracking mechanism in place to refer Medi-Cal Only cases where fraud is suspected to the Medi-Cal Investigator; and we will continue to have the Fraud Investigator make these referrals if Medi-Cal fraud is discovered while investigating IHSS. The county will keep records of the number of referrals made, and the reasons for referrals, as well as any outcomes reported to the county by the Medi-Cal Investigator.

The county will continue to work cooperatively with the Medi-Cal Investigator on any joint cases, providing applicable information. Any cases discovered that involve fraud in the cash aid or food stamp program will be handled in accordance with those regulations, and Health and Human Services will work with the District Attorney to determine how any cases referred for prosecution should be handled. The county will develop policies and procedures to ensure that any information regarding fraud in the cash aid or food stamp programs, during an unannounced home visit or case review or other review, is tracked for the DPA 266.

V. Mechanism for Tracking/Reporting

Trinity County currently has forms used for tracking referrals received and the outcomes of each referral on a monthly basis. This process will be modified so that IHSS referrals can be documented and tracked, and written responses made to Quality Assurance staff. Referrals sent to DHCS will also be tracked, using a spreadsheet.

VI. County's Current and Proposed Anti-Fraud Activities

Trinity County currently performs QA reviews on randomly selected cases, and home visits are made by the IHSS Social Worker. Due to time constraints QA staff can not do in-depth investigations on all cases where fraud is suspected. Using the additional funding would allow the county to do thorough investigations on more cases.

VII. County Proposed Budget for Utilization of Funds

The County proposes hiring an Investigator, at 10 hours per week, beginning December 1, 2009. The table below shows projected salary and mandatory deductions and benefits for this investigator. Integrity efforts will start within 60 days of receipt of funding, and will include unannounced home visits to recipients and case reviews.

	<u>Monthly Salary</u>	<u>Mandatory deductions and benefits</u>	<u>Totals</u>
Dec 09 – May 2010	\$721.93		\$ 4,331.55
June 2010	\$758.02		\$ 758.02
Dec 09 – June 2010		\$6305.50	\$ 6,305.50
Mileage @ \$.55/mile 100 miles/week			\$ 1,400.00
Overhead (phone, rent, util, copier use, etc) @ \$200/month			\$ 1,400.00
Vehicle for home visits (1/4 of \$28,000)			\$ 7,000
Total projected cost			\$21,195.07

VIII. Description of how the County will Integrate Other Program Integrity Efforts within the Plan

Trinity County will continue to use QA as a method of identifying cases with possible IHSS fraud. When fraud in other programs is identified during the investigation of IHSS, it will be referred and investigated as appropriate.

The county is working with the Department of Justice to allow designated staff to receive LiveScan information for the purpose of conducting provider background checks. Approval of the county's application for an ORI number was received on 12/21/2009, and the number is expected to be received within 6-8 weeks of that date. New providers will have a background clearance performed at the time of application, and current providers will have a background clearance performed by June 30, 2010. The county has developed a process to ensure that all providers, not just registry providers, attend an orientation and complete the IHSS Program Provider Enrollment Agreement (SOC 846) once the ORI number is received.

IX. Annual Outcomes Report

Trinity County agrees to submit any required plan update and annual report by the deadlines given. The county will commit to tracking referrals and outcomes and overpayments or underpayments on a spreadsheet to ensure that accurate data is available for the annual report, which will be submitted to CDSS by August 1, 2010.

Exhibit D

The county made no referrals to the District Attorney for prosecution from the IHSS program during the time period cited. The county had out-sourced its SIU and the focus was on cash aid and food stamp fraud prosecutions. The county HHS and District Attorney have worked cooperatively together in the past, including collaborating on Vertical Prosecutions for elder abuse, and anticipate that if any IHSS investigation cases appear to warrant prosecution, they will be referred to the District Attorney.

The name of the County District Attorney Representative is Michael Harper, Trinity County DA. His phone number is 530-623-1304. His email is mharper@trinitycounty.org.

Budget Justification
Trinity County's Fraud Funding Plan for FY 2009-10

Budget Section	Total
A. Personnel Costs (includes employee benefits)	\$ 6513
B. Operating Expenses	\$ 1,000
C. Equipment Expenses	\$ 7,000
D. Travel/Per Diem and Training	\$ 1,100
E. Subcontracts and Consultants	\$ 0
F. Other Costs	\$
G. Indirect Expenses	\$
Total Expenses	\$ 15,613

A. Personnel Costs (including employee benefits)	Total Budget
Title: Fraud Investigator II Salary Calculation: Fraud Investigator II @ 10 hours per week beginning February 1, 2010. \$813.41 salary /month + 489.19 benefits/month = \$1302.60/mo Feb 2010 - June 2010 Duties Description: Incumbent conducts investigations relating to suspected fraudulent receipt of aid, including IHSS; obtains and presents facts and evidence to support administrative action or prosecution; negotiates for and secures repayment of funds fraudulently obtained; and performs related work as required.	\$ 6,513
Title: Salary Calculation: Duties Description:	\$
Title: Salary Calculation: Duties Description:	\$
Title: Salary Calculation: Duties Description:	\$
Title: Salary Calculation: Duties Description:	\$
Title: Salary Calculation: Duties Description:	\$

Total Personnel Costs:	\$ 6,513

B. Operating Expenses	Total Budget
Title: Overhead Description: Phone, rent, utilities, copier use @ \$200/mo	\$ 1,000
Title: Description:	\$
Title: Description:	\$
Total Operating Expenses:	\$ 1,000

C. Equipment Expenses	Total Budget
Title: Vehicle Description: 1/4 cost of a vehicle to be used for performing unannounced home visits or other program integrity activities.	\$ 7,000
Title: Description:	\$
Title: Description:	\$
Total Equipment Expenses:	\$ 7,000

D. Travel/Per Diem and Training	Total Budget
Title: mileage Description: mileage @ .55/mile. 100 miles/wk	\$ 1,100
Title: Description:	\$
Title: Description:	\$
Total Travel/Per Diem and Training:	\$ 1,100

E. Subcontracts and Consultants	Total Budget
Title:	\$
Description:	
Title:	\$
Description:	
Title:	\$
Description:	
Total Subcontracts and Consultants:	\$ 0

F. Other Costs	Total Budget
Title:	\$
Description:	
Title:	\$
Description:	
Title:	\$
Description:	
Title:	\$
Description:	
Title:	\$
Description:	
Total Other Costs:	\$ 0

G. Indirect Expenses	Total Budget
Title:	\$
Description:	
Title:	\$
Description:	
Total Other Costs:	\$ 0

